

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**CRAIG ALLEN JOHNSON,**  
**Plaintiff**

vs.

**TARGET LOGISTICS  
MANAGEMENT, LLC,**  
**Defendant**

§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 4:15-cv-01490**

**Jury Demanded**

**PLAINTIFF CRAIG ALLEN JOHNSON'S FINAL TRIAL PLAN**

<b>A. PLAINTIFF INTENDS TO CALL:</b>	<b>DIRECT</b>	<b>RE-DIRECT</b>
Craig Allen Johnson	<b>6 hours</b>	<b>1 hours</b>
Kristi Johnson	2 hours	.5 hours
Brad Archer	6 hours	1 hour
John Paul Vincent, Ph.D., ABPP	3 hours	1 hour
Helga A. Zauner, MBA, AB, CVA, CFE, MAFF	1 hour	.5 hours
Joseph Murphy	3 hours	.5 hours
Daniel Patrick McGahn by deposition	6 hours	1 hour
Travis Kelley	2 hours	.33 hours
Patrick Murphy by deposition	.5 hours	
Raymond Crump	1.5 hours	.33 hours
Katherine Westgeest by deposition	.5	

David Ludwig by deposition	.5 hours	
Donald Alexander	1.5 hours	.33 hours
Target Corporate Representative - Hiring of Veterans, disabled veterans and Tax credits	McGahan	
Target Corporate Representative - Company's Philosophies as stated in the corporate handbook	McGahan	

Target Corporate Representative - Policies and Procedures from November 2013 through Johnson's resignation	McGahan	
Target Corporate Representative - Company's implementation of the ADA and FMLA	McGahan	
Target Corporate Representative - The Company's investigation December 2014	McGahan	
Target Corporate Representative - The Company's investigation March 2015	McGahan	
Target Corporate Representative - The Company's investigation December 2014 Employment actions taken against Johnson and when	McGahan	
Target Corporate Representative - application of the ADA in this case including notice to Johnson, Johnson's notice to the Company, and the Company's response to Johnson	McGahan	
Target Corporate Representative - application of the FMLA in this case including notice to Johnson, Johnson's notice to the Company, and the Company's response	McGahan	
Target Corporate Representative - the job offers extended to Johnson	McGahan	

<b>B. DEFENDANT'S WITNESSES</b>	<b>PLAINTIFF'S CROSS</b>
Joe Murphy	1 hour
Brad Archer	1 hour
Travis Kelley	1 hour
Ray Crump	1 hour
Donald Alexander	.75 hours
Dan McGahan	1.5 hours
Fred Bass	.75 hours
Tom King	.75 hours
Craig Johnson	1 hour
Kristi Johnson	.5 hours
Terry Legions	.25 hours
Greg Hauck	.25 hours
Danny Handshoe	.25 hours
<b>C. PLAINTIFF'S REMAINING TIME NECESSARY FOR PRESENTATION</b>	<b>PLAINTIFF</b>
Voir Dire	1 hour
Opening	.75 hours
Closing	1 hour

Offers of Proof?	?
<b>D. PLAINTIFF'S TIME NECESSARY FOR HEARING MATTERS</b>	<b>PLAINTIFF</b>
Jury Charge Conferences	3 hours
Motion to Limit Defendant's Testimony to Matters within Individual's Personal Knowledge	.25 hours
Response to Anticipated Motion to Quash Subpoenas	.25 hours

### **NOTICE OF ELECTRONIC FILING**

I, Jo Miller, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above and foregoing document in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 16<sup>th</sup> day of March, 2017.

/s/ Jo Miller  
Jo Miller

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically served on Defendant's counsel of record, Charles L. Stinneford, GORDON ARATA MCCOLLAM DUPLANTIS & EAGAN, LLC, 1980 Post Oak Blvd, Suite 1800, Houston, Texas 77056 on March 16, 2017.

/s/ Jo Miller  
Jo Miller  
Attorney-in-Charge for Plaintiff,  
Craig Allen Johnson